

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

| | | |
|--|---|-------------------------------|
| IN RE: | § | |
| HOUSTON REAL ESTATE PROPERTIES, | § | CASE NO. 22-32998 |
| LLC, | § | (Chapter 7) |
| Debtor. | § | |
| | § | |
| JOHN QUINLAN, OMAR KHAWAJA, | § | |
| AND OSAMA ABDULLATIF, | § | |
| Plaintiffs, | § | ADVERSARY NO. 23-03141 |
| | § | |
| v. | § | |
| | § | |
| JETALL COMPANIES, INC., ARABELLA | § | |
| PH 3201 LLC, 9201 MEMORIAL DR. LLC, | § | |
| 2727 KIRBY 26L LLC, DALIO HOLDINGS | § | |
| I, LLC, DALIO HOLDINGS II, LLC | § | |
| HOUSTON REAL ESTATE PROPERTIES, | § | |
| LLC, SHAHNAZ CHOUDHRI, ALI | § | |
| CHOUDHRI, SHEPHERD-HULDY | § | |
| DEVELOPMENT I, LLC, SHEPHERD- | § | |
| HULDY DEVELOPMENT II, LLC, | § | |
| GALLERIA LOOP NOTE HOLDER | § | |
| LLC, OTISCO RDX LLC, MCITBE, LLC, | § | |
| JETALL/CROIX PROPERTIES LP, AND | § | |
| JETALL/CROIX GP, LLC, | § | |
| Defendants. | § | |

PLAINTIFFS' NOTICE OF REMOVAL

Pursuant to 28 U.S.C. § 1452, Rule 9027, Federal Rules of Bankruptcy Procedure, Rule 9027-1 of the Local Rules for the United States Bankruptcy Court for the Southern District of Texas, Plaintiffs file this Notice of Removal, seeking to remove a state court action from the Harris District Court to the United States Bankruptcy Court for the Southern District of Texas which currently has jurisdiction the estate of Houston Real Estate Properties, LLC (“**HREP**” or “**debtor**”) pursuant to 28 U.S.C. § 1334(b).

1. On October 7, 2022, Houston Real Estate Properties, LLC (“HREP”) filed a voluntary petition under Chapter 11 of the United States Bankruptcy Code in Case No. 22-32998 (the “**Bankruptcy Case**”) in the United States Bankruptcy Court for the Southern District of Texas, Houston Division.

2. On or about July 31, 2023, or August 1, 2023, John Quinlan, Omar Khawaja, and Osama Abdullatif (collectively, “**Plaintiffs**”) filed an adversary case against HREP and several other parties, referenced by Case No. 23-03141 (the “**Adversary**”). In the Adversary, Plaintiffs seek to prove that Defendants are alter egos of each other and have participated and continue to participate in various fraudulent transfers.

3. On or about November 26, 2024, Osama Abdullatiff and Abdullatif & Company, LLC were sued in a state court action commenced by Ali Choudhri, Shahnaz Choudhri, and Jetall Companies, Inc. (collectively hereinafter “**Choudhri**”), in the 11th Judicial District Court of Harris County, Texas, captioned as Cause No. 2024-83320; *Ali Choudhri, Shahnaz Choudhri, and Jetall Companies, Inc. v. Osama Abdullatiff and Abdullatif & Company, LLC* (the “**State Action**”).¹ True and correct copies of all process, pleadings, and orders, if any, are attached hereto as **Exhibit A** with an index of same. Osama Abdullatiff and Abdullatif & Company, LLC have not been served.

4. The State Action is related to the Adversary, and thus it shall be referred to said proceeding. In compliance with Rule 9027 of the Federal Rules of Bankruptcy Procedure, Plaintiffs are filing a notice of removal with the clerk of the district, along with every document filed in the State Action proceeding as required by Rule 9027 of the Local Rules for the United States Bankruptcy Court for the Southern District of Texas (the “**Local Rules**”). Statement Pursuant to FED. R. BANKR. P. 9027(a)(1) and Local Rule 9027-2, Plaintiffs, as the removing party,

¹ This case was subsequently transferred to the 55th Judicial District of Harris County, Texas.

consent to the entry of final orders or judgment by the bankruptcy court. Pursuant to Rule 9027-1 of the Local Rules, Plaintiffs are filing a copy of this Notice with the Clerk in the State Action and serving copies of this Notice upon the Ali Choudhri's, Shahnaz Choudhri's, and Jetall Companies, Inc.'s attorneys. The attached service list contains a list of all parties and counsel to the removed proceeding. This Notice will be amended when possible. Plaintiffs have or will give notice of this Removal to all opposing parties in the State Action as well as the 55th Judicial District Court of Harris County, Texas.

Conclusion

Plaintiffs pray that this action be removed to the United States District Court for the Southern District of Texas, Houston Division, from the 55th Judicial District Court of Harris County, Texas.

Respectfully submitted,

HOOVER SLOVACEK LLP



By: _____
T. Michael Ballases
State Bar No. 24036179
ballases@hooverslovacek.com
Steve A. Leyh
State Bar No. 12318300
leyh@hooverslovacek.com
5051 Westheimer, Suite 1200
Houston, Texas 77056
Telephone: (713) 977-8686
Facsimile: (713) 977-5395

**ATTORNEYS FOR JOHN QUINLAN,
OMAR KHAWAJA, AND OSAMA
ABDULLATIF**

CERTIFICATE OF SERVICE

I hereby certify that, on December 5, 2024, a true and correct copy of John Quinlan, Omar Khawaja, and Osama Abdullatif's Notice of Removal was served electronically via the Court's CM/ECF system, and or as evidenced below.

23-03141 Notice will be electronically mailed to:

James Pope
Jennifer MacGeorge
**Jetall Companies, Inc., Arabella PH
3201 LLC, 9201 Memorial Dr. LLC,
2727 Kirby 26L LLC, Dalio Holdings
I, LLC, Dalio Holdings II, LLC,
Houston Real Estate Properties, LLC
[Debtor], Shahnaz Choudhri, Ali
Choudhri, Shepherd-Huldy
Development I, LLC, Shepherd-
Huldy Development II, LLC, Galleria
Loop Note Holder LLC, Otisco rdX,
LLC, MCITBE, LLC, Jetall/Croix
Properties LP, and its general partner
Jetall/Croix GP, LLC**
The Pope Law Firm
6161 Savoy, Suite 1125
Houston, Texas 77036
jamesp@thepopelawfirm.com
jmac@jlm-law.com
ecf@thepopelawfirm.com

Jana Smith Whitworth
Office of United States Trustee
515 Rusk Street, Suite 3516
Houston, Texas 77002
Jana.whitworth@usdoj.gov

Timothy L. Wentworth
**Randy Williams
Houston Real Estate
Properties, LLC**
Okin Adams, LLP
1113 Vine St., Suite 240
Houston, Texas 77002
twentworth@okinadams.com

Lori A. Hood
Texas State Bar No. 09943430
lhood@shackelford.com
717 Texas Ave., Suite 2700
Houston, Texas 77002
Tel. 832.415.1801
Fax. 832.15.1095
**State Court Counsel for Ali
Choudhri, Shahnaz Choudhri,
and Jetall Companies, Inc.**



T. Michael Ballases

HCDistrictclerk.com

CHOUDHRI, ALI vs. ABDULLATIF, OSAMA

12/5/2024

Cause: 202483320

CDI: 7

Court: 055

APPEALS

No Appeals found.

COST STATMENTS

No Cost Statments found.

TRANSFERS

No Transfers found.

POST TRIAL WRITS

No Post Trial Writs found.

ABSTRACTS

No Abstracts found.

NOTICES

No Notices found.

SUMMARY**CASE DETAILS**

| | |
|-------------------------------|----------------|
| File Date | 11/26/2024 |
| Case (Cause) Location | |
| Case (Cause) Status | Active - Civil |
| Case (Cause) Type | OTHER CIVIL |
| Next/Last Setting Date | 12/6/2024 |
| Jury Fee Paid Date | N/A |

CURRENT PRESIDING JUDGE

| | |
|-------------------|--|
| Court | 055 th |
| Address | 201 CAROLINE (Floor: 9) HOUSTON, TX 77002 Phone:8329272650 |
| JudgeName | LATOSHA LEWIS PAYNE |
| Court Type | Civil |

ACTIVE PARTIES

| Name | Type | Post Jdgm | Attorney |
|---|-------------------|-----------|----------------|
| CHOUDHRI, ALI | PLAINTIFF - CIVIL | | HOOD, LORI ANN |
| ABDULLATIF, OSAMA 5445 ALMEDA RD., HOUSTON, TX 77004 | DEFENDANT - CIVIL | | |
| CHOUDHRI, SHAHNAZ | PLAINTIFF - CIVIL | | HOOD, LORI ANN |
| JETALL COMPANIES INC | PLAINTIFF - CIVIL | | HOOD, LORI ANN |
| ABDULLATIF & COMPANY, LLC 5445 ALMEDA RD., HOUSTON, TX 77004 | DEFENDANT - CIVIL | | |
| ABDULLATIF & COMPANY LLC BY SERVING ITS | REGISTERED AGENT | | |

5445 ALMEDA RD SUITE 500, HOUSTON, TX 77004

INACTIVE PARTIES

No inactive parties found.

JUDGMENT/EVENTS

| Date | Description | Order Signed | Post Jdgm | Pgs | Volume /Page | Filing Attorney | Person Filing |
|------------|--|--------------|-----------|-----|--------------|-----------------|----------------------|
| 12/2/2024 | TRANSFERRED TO HARRIS COUNTY DISTRICT COURT | | | 0 | | | |
| 12/2/2024 | ORDER TRANSFERRING CASE TO ANOTHER DISTRICT COURT SIGNED | 12/2/2024 | | 1 | | | |
| 12/2/2024 | TRANSFERRED TO ANOTHER HARRIS COUNTY DISTRICT COURT | | | 0 | | | |
| 11/27/2024 | HEARING HELD FOR ANOTHER COURT | | | 0 | | | |
| 11/27/2024 | APPEARANCE ON TEMPORARY INJ OR TEMPORARY RESTRAINING ORD | | | 0 | | | |
| 11/27/2024 | EVIDENCE PRESENTED (BENCH HEARING) | | | 0 | | | |
| 11/27/2024 | BENCH HEARING ASSIGNED | | | 0 | | | |
| 11/27/2024 | ORDER SIGNED DENYING TEMPORARY RESTRAINING ORDER | 11/27/2024 | | 1 | | | |
| 11/27/2024 | ORDER SIGNED SETTING HEARING | 11/27/2024 | | 1 | | | |
| 11/26/2024 | ORIGINAL PETITION | | | 0 | | HOOD, LORI ANN | JETALL COMPANIES INC |
| 11/26/2024 | ORIGINAL PETITION | | | 0 | | HOOD, LORI ANN | CHOUDHRI, SHAHNAZ |
| 11/26/2024 | ORIGINAL PETITION | | | 0 | | HOOD, LORI ANN | CHOUDHRI, ALI |

SETTINGS

| Date | Court Post Jdgm | Docket Type | Reason | Results | Comments | Requesting Party |
|---------------------|-----------------|------------------|--|---------|-----------------------|------------------|
| 11/27/2024 01:00 PM | 055 | Ancillary Docket | TEMPORARY RESTRAINING ORDER (MOTION FOR) | Tried | DENIED O/S 11/27/2024 | HOOD, LORI ANN |
| 12/06/2024 08:30 AM | 055 | Law Day Docket | TEMPORARY INJUNCTION (MOTION FOR) | | | |

SERVICES

| Type | Status | Instrument | Person | Requested | Issued | Served | Returned | Received | Tracking | Deliver To |
|------------------|----------------------|-------------------|----------------------|------------|------------|--------|----------|----------|----------|------------|
| CITATION SERVICE | ISSUED/IN POSSESSION | ORIGINAL PETITION | ABDULLATIF & COMPANY | 11/26/2024 | 11/26/2024 | | | | 74410796 | E-MAIL |

OF SERVING
AGENCYLLC BY
SERVING ITS

5445 ALMEDA RD SUITE 500 HOUSTON TX 77004

CITATION SERVICE ORIGINAL ABDULLATIF, 11/26/2024 11/26/2024
ISSUED/IN PETITION OSAMA
POSSESSION
OF SERVING
AGENCY

74410810 E-MAIL

5445 ALMEDA RD. HOUSTON TX 77004

DOCUMENTS

| Number | Document | Post Jdgm | Date | Pgs |
|--------------|---|--------------|------------|-----|
| 117787010 | ORDER TRANSFERRING CASE TO ANOTHER DISTRICT COURT SIGNED | | 12/02/2024 | 1 |
| 117750517 | ORDER SIGNED DENYING TEMPORARY RESTRAINING ORDER | | 11/27/2024 | 1 |
| | ORDER SIGNED SETTING HEARING | | 11/27/2024 | |
| 117734036 | PLAINTIFFS ORIGINAL PETITION APPLICATION FOR TEMPORARY AND PERMANENT INJUNCTION AND REQUEST FOR DISCLOSURE | | 11/26/2024 | 12 |
| | PLAINTIFFS ORIGINAL PETITION APPLICATION FOR TEMPORARY AND PERMANENT INJUNCTION AND REQUEST FOR DISCLOSURE | | 11/26/2024 | |
| -> 117734037 | Exhibit A | | 11/26/2024 | 3 |
| | Exhibit A | | 11/26/2024 | |
| -> 117734038 | Exhibit B | | 11/26/2024 | 24 |
| | Exhibit B | | 11/26/2024 | |
| -> 117734039 | Exhibit C | | 11/26/2024 | 27 |
| | Exhibit C | | 11/26/2024 | |
| -> 117734042 | Proposed Order Granting Plaintiffs Application for Temporary Injunction and Permanent Injunction | | 11/26/2024 | 2 |
| | Proposed Order Granting Plaintiffs Application for Temporary Injunction and Permanent Injunction | | 11/26/2024 | |
| -> 117734041 | Request for Issuance of Service | | 11/26/2024 | 1 |
| | Request for Issuance of Service | | 11/26/2024 | |
| -> 117734040 | Request for Issuance of Service | | 11/26/2024 | 1 |
| | Request for Issuance of Service | | 11/26/2024 | |
| 117734036 | PLAINTIFFS ORIGINAL PETITION APPLICATION FOR TEMPORARY AND PERMANENT INJUNCTION AND REQUEST FOR DISCLOSURE | | 11/26/2024 | 12 |
| -> 117734037 | Exhibit A | | 11/26/2024 | 3 |
| -> 117734038 | Exhibit B | | 11/26/2024 | 24 |
| -> 117734039 | Exhibit C | | 11/26/2024 | 27 |
| -> 117734042 | Proposed Order Granting Plaintiffs Application for Temporary Injunction and Permanent Injunction | | 11/26/2024 | 2 |
| -> 117734041 | Request for Issuance of Service | | 11/26/2024 | 1 |
| -> 117734040 | Request for Issuance of Service | | 11/26/2024 | 1 |

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

| | | |
|---|---|-------------------------------|
| IN RE: | § | |
| HOUSTON REAL ESTATE PROPERTIES, LLC, | § | CASE NO. 22-32998 |
| Debtor. | § | (Chapter 7) |
| | § | |
| JOHN QUINLAN, OMAR KHAWAJA, | § | |
| AND OSAMA ABDULLATIF, | § | |
| Plaintiffs, | § | ADVERSARY NO. 23-03141 |
| | § | |
| v. | § | |
| | § | |
| JETALL COMPANIES, INC., ARABELLA | § | |
| PH 3201 LLC, 9201 MEMORIAL DR. LLC, | § | |
| 2727 KIRBY 26L LLC, DALIO HOLDINGS | § | |
| I, LLC, DALIO HOLDINGS II, LLC | § | |
| HOUSTON REAL ESTATE PROPERTIES, | § | |
| LLC, SHAHNAZ CHOUDHRI, ALI | § | |
| CHOUDHRI, SHEPHERD-HULDY | § | |
| DEVELOPMENT I, LLC, SHEPHERD- | § | |
| HULDY DEVELOPMENT II, LLC, | § | |
| GALLERIA LOOP NOTE HOLDER | § | |
| LLC, OTISCO RDX LLC, MCITBE, LLC, | § | |
| JETALL/CROIX PROPERTIES LP, AND | § | |
| JETALL/CROIX GP, LLC, | § | |
| Defendants. | § | |

**LIST OF STATE COURT COUNSEL OF RECORD
AND INDEX OF PLEADINGS**

1. State Court Counsel for Osama Abdullatif
T. Michael Ballases
Steve Leyh
Galleria Tower II
5051 Westheimer, Suite 1200
Houston, Texas 77056
Telephone: (713) 977-8686
Facsimile: (713) 977-5395
Email: ballases@hooverslovacek.com, leyh@hooverslovacek.com,
2. State Court Counsel for Ali Choudhri, Shahnaz Choudhri, and Jetall Companies, Inc.

Lori A. Hood
 Texas State Bar No. 09943430
lhood@shackelford.com
 717 Texas Ave., Suite 2700
 Houston, Texas 77002
 Tel. 832.415.1801
 Fax. 832.15.1095

INDEX OF PLEADINGS

| No. | Name of Document | Date filed |
|-----|---|------------|
| 1. | Plaintiff's Original Petition Application for Temporary and Permanent Injunction and Request for Disclosure | 11/26/2024 |
| 2. | Signed Order Denying Temporary Restraining Order; Order Setting Hearing | 11/27/2024 |
| 3. | Transfer Order | 12/02/2024 |

Respectfully submitted,

HOOVER SLOVACEK LLP

By: /s/ T. Michael Ballases

Steve A. Leyh
 State Bar No. 12318300
 T. Michael Ballases
 State Bar No. 24036179
 Christopher J. Kronzer
 State Bar No. 24060120
 Angeline V. Kell
 State Bar No. 24040009
 5051 Westheimer, Suite 1200
 Houston, Texas 77056
 Telephone: (713) 977-8686
 Facsimile: (713) 977-5395
leyh@hooverslovacek.com
ballases@hooverslovacek.com
kronzer@hooverslovacek.com
kell@hooverslovacek.com

ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that, on December 5, 2024, a true and correct copy of John Quinlan, Omar Khawaja, and Osama Abdullatif's Notice of Removal was served electronically via the Court's CM/ECF system, and or as evidenced below.

23-03141 Notice will be electronically mailed to:

James Pope
Jennifer MacGeorge
**Jetall Companies, Inc., Arabella PH
3201 LLC, 9201 Memorial Dr. LLC,
2727 Kirby 26L LLC, Dalio Holdings
I, LLC, Dalio Holdings II, LLC,
Houston Real Estate Properties, LLC
[Debtor], Shahnaz Choudhri, Ali
Choudhri, Shepherd-Huldy
Development I, LLC, Shepherd-
Huldy Development II, LLC, Galleria
Loop Note Holder LLC, Otisco rdX,
LLC, MCITBE, LLC, Jetall/Croix
Properties LP, and its general partner
Jetall/Croix GP, LLC**
The Pope Law Firm
6161 Savoy, Suite 1125
Houston, Texas 77036
jamesp@thepopelawfirm.com
jmac@jlm-law.com
ecf@thepopelawfirm.com

Jana Smith Whitworth
Office of United States Trustee
515 Rusk Street, Suite 3516
Houston, Texas 77002
Jana.whitworth@usdoj.gov

Timothy L. Wentworth
**Randy Williams
Houston Real Estate
Properties, LLC**
Okin Adams, LLP
1113 Vine St., Suite 240
Houston, Texas 77002
twentworth@okinadams.com

Lori A. Hood
Texas State Bar No. 09943430
lhood@shackelford.com
717 Texas Ave., Suite 2700
Houston, Texas 77002
Tel. 832.415.1801
Fax. 832.15.1095
**State Court Counsel for Ali
Choudhri, Shahnaz Choudhri,
and Jetall Companies, Inc.**



T. Michael Ballases